

EXHIBIT 21
FILED UNDER SEAL

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Civil Action No. 4:20-cv-00957-SDJ

**DECLARATION OF [REDACTED] IN SUPPORT OF
DEFENDANT GOOGLE LLC'S RESPONSES TO PLAINTIFFS' THIRD SET OF
INTERROGATORIES**

I, [REDACTED] pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Software Engineer employed by Google LLC. I have been employed at Google since January 2013, and since then have been a member of the Ad Manager Reporting & Insights Team. In my capacity as a member of the Ad Manager Reporting & Insights Team, I am responsible for building pipelines to digest historical data and produce analytics and insights to our customers. As part of my duties, I am familiar with the tools available at Google to access, search, and store data in Google's ad logs.
2. The contents of this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge and review of relevant records. If called upon as a witness in this action, I could and would testify competently thereto.

3. I understand that the Plaintiffs in the above-captioned litigation have requested the following data on a monthly basis dating back to January 1, 2013 for each of 16 defined “Google Auction Mechanics”:
 - a. “the number of impressions where such Google Auction Mechanic had any effect on bids, floor prices, or revenue shares, and the percentage of such impressions as a share of overall impressions, which otherwise would not have been affected had the Google Auction Mechanic not been operational”;
 - b. “the number and percentage of AdX auctions on which the Google Auction Mechanic had an effect on bids, floor prices, revenue shares, or margins, which otherwise would not have been affected had the Google Auction Mechanic not been operational”;
 - c. “Google’s revenues and profits attributable to such Google Auction Mechanic”; and
 - d. “any additional value gained by [Google], including in the form of improved position or share in any and all Ad Tech Product markets.”
4. I further understand that Plaintiffs have additionally requested 19 separate pieces of data associated with one particular Google Auction Mechanic, Project Bernanke, on a monthly basis dating back to the inception of Product Bernanke.
5. I understand that Google has already produced to Plaintiffs a variety of monthly aggregate datasets, including on May 30, 2023, July 6, 2023, and February 15, 2024, that may include data relevant to Plaintiffs’ requests. Beyond what may be included in these

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datasets, I am not aware of Google maintaining in the ordinary course of business a monthly or other aggregate dataset or datasets responsive to Plaintiffs' requests.

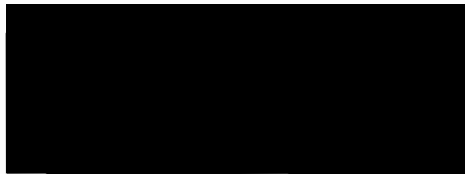
6. To respond to these requests in full, Google would need to attempt to create this data through a manual process. In particular, Google would need to compile and review data from its ad logs ("log-level" data) to first identify: (1) which of the 16 Google Auction Mechanics are identifiable in the log-level data, then (2) determine if any of the identifiable "Google Auction Mechanics" were present on a given auction, then (3) attempt to calculate the impact, if any, along all the Plaintiffs' requested dimensions. That process would need to be repeated across trillions of auctions. Google's systems are not designed to analyze or produce data in this way.
7. I have been involved in the creation of several bespoke log-level datasets that do not exist in the ordinary course of Google's business for the purposes of responding to requests in this and related litigation. Each involved substantially smaller amounts of data than what Plaintiffs are requesting and took months to complete.
8. For example, Google created a log-level dataset for the Department of Justice ("DOJ") during the course of its investigation, which comprised approximately 24 terabytes of data and covers more than 280 billion bids in Google Ad Manager auctions for U.S. web impressions between March 9, 2022 and March 15, 2022. Creating this dataset took Google engineers approximately six months to complete.
9. Responding to Plaintiffs' requests would involve extensive and highly complex custom engineering work and a volume of data that far exceeds the volume associated with prior

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log-level datasets that Google has created. As such, I cannot at this time provide an exact estimate of the length of time it would require to build such a dataset or even state with confidence whether such an effort would ultimately be successful. Based on my prior experience creating custom log-level datasets, however, it would likely require no less than six months and potentially substantially longer to attempt to create the data requested by the Plaintiffs.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, NY on the 24th day of May, 2024.

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